

Exhibit I

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION

4 IN RE: ETHICON, INC.,
5 PELVIC REPAIR SYSTEMS
6 PRODUCTS LIABILITY LITIGATION MDL NO. 2327

7 Jo Huskey and Allen

8 Huskey,

9 Plaintiffs,

10 v.

Case No. 2:12-cv-05201

11 Ethicon, Inc., et al.,

12 Defendants.

13
14 ORAL DEPOSITION OF
15 CHRISTINA PRAMUDJI, M.D.
16 Friday, April 11, 2014

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21 GOLKOW TECHNOLOGIES, INC.
22 877.370.3377 ph|917.591.5672 fax
23 deps@golkow.com
24

1 the removal surgeries can be significantly
2 more complicated than the original
3 implantation surgery for the TVT-O, right?

4 MR. SNELL: Form.

5 A. It can be harder to find the
6 sling if it's not a dyed sling.

7 BY MS. KIRKPATRICK:

8 Q. And the removal surgery requires
9 dissection of some of the pelvic tissue,
10 correct?

11 A. Well, it requires dissecting
12 around the urethra, primarily.

13 Q. And that can cause additional
14 scar tissue, correct, simply because you're
15 having more surgery in the same location?

16 A. It could, yes.

17 Q. Are there any other complications
18 that you think are risks that come from the
19 removal surgery itself?

20 A. No.

21 Q. So just the possibility of
22 additional scarring?

23 A. Yes.

24 Q. Okay. We've been talking a lot

1 about kind of the procedure that's used here.

2 You're not a biomaterials expert, correct?

3 A. Well, I know about the materials
4 that I use for surgery, so I would say that
5 I -- you know, I'm knowledgeable about what I
6 implant in patients.

7 Q. Okay. What's the Ethicon TVT-O
8 sling made of?

9 A. Polypropylene.

10 Q. Okay. What's added to that
11 polypropylene?

12 A. What's added to it?

13 Q. Uh-huh.

14 A. I don't know if anything's added
15 to it.

16 Q. Do you know if there's any
17 antioxidants used in it?

18 A. No, I don't know.

19 Q. Do you know what its molecular
20 weight is?

21 A. I've seen it before, but I don't
22 know off the top of my head.

23 Q. Do you know whether it's been
24 oxidized before it's been placed into a

1 woman's body?

2 A. No.

3 Q. Do you know anything about the
4 process of oxidation of polypropylene?

5 A. No.

6 Q. And that's not the type of
7 information -- you know that it's made of
8 polypropylene, but you're not intending to
9 offer opinions here concerning the chemical
10 processes that are involved with
11 polypropylene, correct?

12 A. I don't know about the chemical
13 processes.

14 Q. Okay. So you would defer -- you
15 would defer to other experts who would be
16 biomaterials experts or who would be
17 specialists in polypropylene for that
18 particular type of information?

19 MR. SNELL: Form.

20 A. I know how it -- I focus on it
21 from the perspective of my patients.

22 BY MS. KIRKPATRICK:

23 Q. Okay. So you focus, though, on
24 how you believe the polypropylene sling

1 performs in your patients, both from an
2 efficacy standpoint, correct, and from
3 complications that you see?

4 A. From my experience and from the
5 vast body of literature that's available on
6 polypropylene slings.

7 Q. Okay. But I guess I'm just
8 trying to figure out what the parameters of
9 your testimony are. You're not going to come
10 in and you're not planning on holding
11 yourself out as an expert on polymers and
12 polypropylene and degradation or any of those
13 particular issues related to polypropylene,
14 are you?

15 MR. SNELL: Form. And I will say
16 she is. I am putting her up on that, and
17 it is in her report.

18 BY MS. KIRKPATRICK:

19 Q. Okay. How does polypropylene
20 degrade?

21 A. It doesn't degrade.

22 Q. So your opinion, sitting here
23 today, that there is no way that any
24 polypropylene that exists in this world can

1 degrade?

2 MR. SNELL: That's overbroad,
3 form.

4 Go ahead.

5 A. That's a very broad question.
6 You know, from how it's used in the body in
7 sutures and in slings, it doesn't degrade;
8 that's why it's a permanent suture. That's
9 why heart surgeons rely on it and cardiac
10 surgeons rely on it to sew up your aorta when
11 you have aortic surgery.

12 So if it degraded, it would not
13 be used in that application. There's no
14 clinical degradation that occurs.

15 BY MS. KIRKPATRICK:

16 Q. So you believe that there's no
17 evidence that exists, either in Ethicon's own
18 documents or in the literature, that supports
19 the theory that polypropylene sutures can
20 degrade --

21 MR. SNELL: Form.

22 Go ahead.

23 BY MS. KIRKPATRICK:

24 Q. -- in vivo?

1 MR. SNELL: Form.

2 A. I mean, I can't say that there's
3 nothing out there that they didn't do any
4 kind of manipulation to polypropylene or look
5 at it a certain way and found some
6 degradation there, but does it matter to
7 patients and to this case, no.

8 BY MS. KIRKPATRICK:

9 Q. Has Mr. Snell or any of the
10 attorneys for Ethicon provided you with any
11 Ethicon documents reflecting degradation of
12 polypropylene sutures?

13 A. I mean, I think I saw some
14 internal communication, I can't remember if
15 it was from Mr. Kountze or from Mr. Snell, I
16 don't remember, but I know that that is out
17 there, that that was something that the
18 engineers were talking about and Ethicon was
19 talking about.

20 But clinically, I'm telling you
21 it does not make a difference, and I don't
22 believe that there's degradation that occurs
23 that it makes any hill of beans' difference
24 for patients.

1 Q. Okay. So let me just figure out
2 what you are testifying about and what you're
3 not testifying about. You don't have a basis
4 for saying whether polypropylene does or
5 doesn't degrade.

6 What you are here to offer your
7 opinion on is that regardless of whether
8 polypropylene degrades or doesn't degrade,
9 there's no clinical significance to a
10 particular patient?

11 A. I don't think it degrades.

12 MR. SNELL: Hold on, hold on,
13 hold on. Form. That misstates, too.

14 Go ahead.

15 A. I don't think it degrades and I
16 think there's other evidence that shows that
17 it doesn't degrade.

18 BY MS. KIRKPATRICK:

19 Q. Have you asked Ethicon, in
20 reaching that opinion, to provide you with
21 all of the information that they have
22 concerning the potential degradation of
23 polypropylene sutures?

24 A. No.